Supreme Court, U.S.
FILED
JAN 28 2014
OFFICE OF THE CLERK

Nos. 13-354 & 13-356

IN THE

Supreme Court of the United States

KATHLEEN SEBELIUS, ET AL., *Petitioners*,
v.
HOBBY LOBBY STORES, INC., ET AL., *Respondents*.

CONESTOGA WOOD SPECIALTIES, ET AL., *Petitioners*,
v.
KATHLEEN SEBELIUS, ET AL., *Respondents*.

On Writs of Certiorari to the United States Courts of Appeals for the Third and Tenth Circuits

BRIEF OF 38 PROTESTANT THEOLOGIANS, SOUTHEASTERN BAPTIST THEOLOGICAL SEMINARY, COALITION OF AFRICAN AMERICAN PASTORS, MANHATTAN DECLARATION, AND INSTEP INTERNATIONAL AS *AMICI CURIAE* IN SUPPORT OF HOBBY LOBBY AND CONESTOGA, ET AL.

JAY T. THOMPSON
Counsel of Record
MILES COLEMAN
BRANDON SMITH
NELSON MULLINS RILEY & SCARBOROUGH, LLP
1320 Main Street
Columbia, SC 29201
jay.thompson@nelsonmullins.com
(803) 799-2000

Counsel for *Amici Curiae*

WILSON-EPES PRINTING CO., INC. – (202) 789-0096 – WASHINGTON, D. C. 20002

Library of Congress
Law Library

TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES iii

INTEREST OF *AMICI CURIAE* 1

SUMMARY OF ARGUMENT 4

ARGUMENT 6

I. Christian doctrine requires that faith govern every aspect of a Christian's life 6

II. Christian doctrine teaches that an individual's vocation is ordained by God as a spiritual enterprise in which Christians must serve in accordance with their spiritual callings 10

A. The Christian doctrine of vocation teaches that all work is spiritual activity 11

B. The Christian theology of vocation encompasses both overtly sacred and seemingly secular occupations 13

C. The Christian doctrine of vocation teaches that Christians are called by God to specific occupations and activities 17

D. The Christian doctrine of vocation requires that Christians act in their vocations in accordance with their Christian beliefs 20

III. Christian doctrine states it is a sin for a Christian to enable or aid another in doing what the Christian believes to be sin 24

IV. Requiring a Christian to choose between violating the Government's regulations or violating his sincerely held religious beliefs substantially burdens his exercise of religion 27

CONCLUSION 31

TABLE OF AUTHORITIES

Page

CASES

Attorney Gen. v. Desilets,
636 N.E.2d 233 (Mass. 1994) 26

Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah,
508 U.S. 520 (1993) 29

Employment Division, Department of Human Resources v. Smith,
494 U.S. 872 (1990) 27

Gilardi v. U.S. Dept. of Health and Human Servcs.,
733 F.3d 1208 (D.C. Cir. 2013)..... 24

Hanna v. Secretary of the Army,
513 F.3d 4 (1st Cir. 2008)..... 25

Hernandez v. C.I.R.,
490 U.S. 680 (1989) 28

Hosanna-Tabor Evangelical Lutheran Church & Sch. v. EEOC,
132 S. Ct. 694 (2012) 6, 17

Korte v. Sebelius,
735 F.3d 654 (7th Cir. 2013) 8, 11

O'Bryan v. Bureau of Prisons,
349 F.3d 399 (7th Cir. 2003) 28

Sherbert v. Verner,
374 U.S. 398 (1963) 27, 30

Spencer v. World Vision, Inc.,
633 F.3d 723 (9th Cir. 2011) 6

State by Cooper v. French, 460 N.W.2d 2
(Minn. 1990) 26

Thomas v. Anchorage Human Rights Comm'n,
165 F.3d 692 (9th Cir. 1999) 26

Thomas v. Review Bd. of Indiana Employment Sec. Div.,
450 U.S. 707 (1981) 28, 29, 30

United States v. Lee,
455 U.S. 252 (1982) 28

United States v. Seeger,
380 U.S. 163 (1965) 28

Wisconsin v. Yoder,
406 U.S. 205 (1972) 27, 28

STATUTES

42 U.S.C. § 2000bb(b)(1) 27

42 U.S.C. § 2000cc-5(7)(A) 28

42 U.S.C. § 238n 25

42 U.S.C. § 300a-7 25

42 U.S.C. §§ 2000bb *et seq.* 27

50 U.S.C. App. § 456(j) 25

REGULATIONS

45 C.F.R. § 147.131 (2013) 30

78 Fed. Reg. 39870 (July 2, 2013) 30

SCRIPTURE - ENGLISH STANDARD VERSION

1 Corinthians 10:31 7
1 Corinthians 7:17 17
1 Corinthians 8:9-13 24
1 Thessalonians 4:11-12 14
1 Timothy 1:19. 9
1 Timothy 3:9. 9
Colossians 3:17 7
Colossians 3:23-24 ..... 7, 11
Daniel 3:1-30 9
Ecclesiastes 3:1-13 7
Ephesians 4:28 11
Esther 4:14 18
Genesis 1:1 12
Genesis 1:27 12
Genesis 1:28 13
Genesis 2:7 12
James 2:17 8
Mark 12:31 21
Mark 6:3 12
Matthew 18:6 24
Psalm 24:1 6
Romans 12:1 8
Romans 14:13-14 24

OTHER AUTHORITIES

17 *D. Martin Luthers Werke: Kritische Gesamtausgabe* (1883) 21

Calvin, John, *Institutes of the Christian Religion* (1559) (John T. McNeill ed., Ford Lewis Battles trans., 1960) 18

Compact Oxford English Dictionary 14, 18

Confession of Faith in a Mennonite Perspective, 1995, Article 17 7

Foxe, John, *Acts and Monuments* (1563) 9

Gonzalez, Justo L., *The Story of Christianity* (1984) 9

Guinness, Os, *The Call: Finding and Fulfilling the Central purpose of Your Life* (1998) 20

Keller, Timothy, *Every Good Endeavor: Connecting Your Work to God's Work* 38 (2013) 13

Law, William, *A Serious Call to a Devout and Holy Life* (1728) 17

Luther, Martin, *Luther's Works, Vol. 33: Career of the Reformer III* (1972) 10

Mather, Cotton, *Two brief Discourses. One Directing A Christian in his General Calling; Another Directing him in his Personal Calling* (B. Green, et al. eds., 1701) 7, 16, 19

Mennonite Church USA Confession of Faith, Art. 23, *The Church's Relation to Government and Society* *23*

Perkins, William, *A Treatise of the Vocations* 750 (1631) 15, 23

Placher, William C., ed., *Callings: Twenty Centuries of Wisdom on Vocation* (2005) 18

Presbyterian Church in America, *Preface to the Book of Church Order* 9

Rienzi, L., *The Constitutional Right Not to Kill*, 62 Emory L.J. 121 (2012) 26

Ryken, Leland, *Work and Leisure in Christian Perspective* (1987) 12, 13, 15

Sayers, Dorothy, *Creed or Chaos? Why Christians Must Choose Either Dogma or Disaster (Or, Why It Really Does Matter What You Believe)* (1949) 12

Schuurman, Douglas J., *Vocation: Discerning Our Callings in Life* (2004) 15, 23

The Baptist Faith & Message 2000. ..... 7, 22, 29

The Large Catechism by Martin Luther (1529), reprinted in *Triglot Concordia: The Symbolical Books of the Ev. Lutheran Church* (1921) 25

The Larger Catechism of the Westminster Assembly (1841). 24

The Pew Forum on Religion & Public Life, *U.S. Religious Landscape Survey* (2008) 15

Trueblood, Elton, *Your Other Vocation* (1952) ... 20

U.S. Census Bureau, 2012 Statistical Abstract, *American Religious Identification Survey 2008: Self-Described Religious Identification of Adult Population* *15*

Veith, Gene Edward, Jr., *God at Work: Your Christian Vocation in All of Life* (2002) 14, 15

Vincent, Thomas, *An Explanation of the Assembly's Shorter Catechism* (1806). 25

Watts, Isaac, *The Poetical Works of Isaac Watts, Vol. IV* (1782)..... 6

Webster's Third New Int. Dictionary (2002) . 14, 18

Westminster Confession of Faith (1646)..... 21

Wingren, Gustaf, *Luther on Vocation* (Carl Rasmussen, tr.) (1957) 21

INTEREST OF *AMICI CURIAE* [1]

The **Southeastern Baptist Theological Seminary** ("SEBTS") is a seminary of the Southern Baptist Convention located in Wake Forest, North Carolina. The seminary exists to train, educate, and prepare ministers of the gospel for faithful service. In addition, SEBTS is home to the L. Russ Bush Center for Faith and Culture, which seeks to bring the Christian faith to bear upon all areas of the human experience in a spirit of Christian love and respect and to provide a responsible voice in the public square, speaking Christian truth to the issues and concerns facing contemporary culture. The seminary believes that as a matter of long-standing Protestant theology, the government regulations at issue in this appeal jeopardize the ability of Christian believers to exercise their religion in obedience to its demands.

The **Coalition of African American Pastors** ("CAAP") is a nonpartisan association of Protestant African American clergy and Christians who support the role of religion in American public life and encourage Christians of all races and backgrounds to live in accordance to their faith, both in their private and public lives. CAAP is concerned that the government regulations at issue in this appeal substantially burden Christians' ability to do so.

---

[1] The parties' counsel were timely notified of and consented to the filing of this brief. Neither a party nor its counsel authored this brief in whole or in part. No person or entity, other than the *amici curiae*, their members, or their counsel made a monetary contribution to the preparation and submission of this brief.

The **Manhattan Declaration** is a coalition of theologians, Christian leaders, and philosophers united to build a movement of Christians who will stand together alongside other men and women of goodwill to advance the sanctity of life, rebuild and revitalize the marriage culture, and protect religious liberty. The theological and philosophical treatise, "The Manhattan Declaration: A Call of Christian Conscience," authored by Princeton professor Robert P. George, Charles W. Colson, and Dr. Timothy George, has been signed by more than 150 American religious leaders and more than 540,000 lay Christians. The Manhattan Declaration fears the regulations giving rise to this appeal threaten both the lives of the unborn and the vitality of American religious liberty.

InStep International ("InStep") is a religious organization in Atlanta, Georgia, that partners with Christian leaders, ministries, and lay Christians to coordinate resources and efforts to spread the gospel of Jesus Christ through teaching, training, and humanitarian efforts both domestically and overseas. The President of InStep, Rev. Gregory Smith, serves in part as a corporate chaplain, providing executive coaching and leadership, to for-profit Christian business leaders seeking to create a faith-friendly corporate culture. InStep believes that the inseparability of a Christian's faith and vocation is consistent with the Bible, the Christian faith, Protestant teaching and denominational requirements, and thereby enables business owners to faithfully exercise their religious beliefs under their First Amendment rights afforded by the United States Constitution.

The **38 individual signatories**, listed in full in the Appendix, are theologians, scholars, and pastors, who study, write, teach, and minister in a broad spectrum of Protestant seminaries, colleges, and churches. They have collectively amassed tens of thousands of hours studying the Holy Scripture and Protestant theology, have taught thousands of seminarians and ministers, written several New York Times Bestselling books, authored hundreds of theology treatises and devotional works, overseen seminaries, headed a number of theological journals, and preached thousands of sermons. Each of the signers affirms that Scripture, Protestant doctrine, and church tradition established throughout the 500-year history of Protestant theology require Christians to conduct themselves in their business and occupational affairs in obedience to Scriptural commands and Christian doctrine, and that the government regulations at issue here substantially burden Christians' ability to comply with this spiritual obligation.

SUMMARY OF ARGUMENT

This brief demonstrates, historically and theologically, that requiring a Protestant Christian to choose between violating the Government's regulations or violating his sincerely held religious beliefs substantially burdens his exercise of religion in violation of the Religious Freedom Restoration Act and the First Amendment to the United States Constitution.

A fundamental aspect of Christian doctrine is its requirement that faith must govern every aspect of a Christian's life. As a matter of scriptural teaching, church tradition, denominational requirement, and conscience, the exercise of the Christian religion must guide and determine a Christian's decisions, choices, words, and deeds, both in private and in every facet of life.

The holistic nature of the Christian faith extends to a believer's vocation. The Christian doctrine of vocation teaches that all work—whether overtly sacred or ostensibly secular—is spiritual activity, that Christians are called by God to specific occupations and businesses, and that Christians must conduct themselves in their vocations in accordance with their Christian beliefs. A Christian may not simply check his faith at the workplace door. Accordingly, Christian business owners, as a matter of scriptural requirement, are obligated to conduct their business as an expression of their faith and in accordance with the dictates of faith and conscience.

The theological requirement that Christians comply with scriptural commands in their occupation prohibits not only direct and personal wrongdoing, but also the enabling, authorizing, or aiding of

another in doing what the Christian believes to be sin. Christian doctrine teaches that one who knowingly aids or abets another's wrongdoing has himself done wrong. Accordingly, a statute or regulation requiring a Christian business owner's complicity in conduct that his or her faith teaches is morally wrong forces a Christian into an impossible position and imposes a substantial burden on his or her exercise of religion.

ARGUMENT

I. Christian doctrine requires that faith govern every aspect of a Christian's life.

A fundamental aspect of Christianity is its requirement that the Christian faith govern all aspects of the believer's life. This teaching is drawn directly from the Holy Scripture and stems from the Christian belief that God's sovereignty extends over every area of human endeavor. *See, e.g., Psalm* 24:1 ("The earth is the Lord's and the fullness thereof, the world and those who dwell therein.").[2] In the words of the English theologian and poet Isaac Watts, God's "love, so amazing, so divine, demands my life, my soul, my all." Isaac Watts, *The Poetical Works of Isaac Watts, Vol. IV* 173 (1782).

Accordingly, Christianity has never limited its reach merely to matters of theology and ceremonial observance. *See, e.g., Hosanna-Tabor Evangelical Lutheran Church & Sch. v. EEOC*, 132 S. Ct. 694, 713 (2012) (Alito, J., concurring) (agreeing with the Court's unanimous opinion that the job duties of a Lutheran minister engaged in education "reflected a role in conveying the Church's message and carrying out its mission" and observing that "[r]eligious teachings cover the gamut from moral conduct to metaphysical truth."); *Spencer v. World Vision, Inc.*, 633 F.3d 723 (9th Cir. 2011) (per curiam) (finding a Christian humanitarian organization "'working with children, families and their communities worldwide to reach their full potential by tackling the causes of poverty and injustice'" was a religious activity); *see*

---

[2] All quotations of Scripture herein are taken from the Holy Bible, English Standard Version.

also Confession of Faith in a Mennonite Perspective, 1995, Article 17 ("In *all* areas of life, we are called to be Jesus' disciples.") (emphasis added), *available at* http://www.mennoniteusa.org/about/confession-of-faith-in-a-mennonite-perspective-1995/article-17-discipleship/; *The Baptist Faith & Message 2000*, Article XIII ("God is the source of all blessings, temporal and spiritual; all that we have and are we owe to Him. . . . [Christians] are therefore under obligation to serve Him with their time, talents, and material possessions; and should recognize all these as entrusted to them to use for the glory of God and for helping others."), *available at* http://www.sbc.net/bfm/bfm2000.asp (all links last visited January 22, 2014).

Rather, Christianity teaches that one's faith influences even those areas of life that appear superficially unrelated to worship, prayer, or theology. *See, e.g., Colossians* 3:17 ("And whatever you do, in word or deed, do everything in the name of the Lord Jesus."). Indeed, Christianity teaches there is spiritual significance in *every* part of life, including seemingly mundane acts like eating, drinking, and working. *See 1 Corinthians* 10:31 ("So whether you eat or drink or whatever you do, do all for the glory of God."); *Colossians* 3:23-24 ("Whatever you do, work heartily, as to the Lord."); *Ecclesiastes* 3:1-13 (noting "[f]or everything there is a season, and a time for every matter under heaven" and that "everyone should eat and drink and take pleasure in all his toil—this is God's gift to man"). From the earliest days of Protestant faith in America, theological leaders have proclaimed this principle. *See, e.g.*, Cotton Mather, *Two brief Discourses. One Directing A Christian in his General Calling; Another Directing*

him in his Personal Calling 64 (B. Green, et al. eds., 1701) ("[L]et every Christian Walk with God, when he Works at his Calling, and Act in his Occupation with an Eye to God, Act as under the Eye of God."). These holistic demands of Christianity require consistency in familial, business, and social relations and are not limited to sacerdotal, ecclesial, or ritual matters.

This integration of a Christian's entire life in relation to God is an outgrowth of the Christian gospel, which provides that God, completely righteous and without sin, by His infinite grace, justifies man who is by nature unrighteous and sinful. This cannot be accomplished by any work or merit by man to somehow achieve good standing with God, but instead is accomplished by and through the work of Jesus Christ's death on the cross. Thus, by faith alone in Christ alone, man is counted righteous by God.

This doctrinal requirement that a Christian must pursue all aspects of his or her life in obedience to Christ compels Christians to do more than give mere intellectual assent. The Christian faith requires not only belief, but also conduct, and this requirement extends to every facet of the Christian's life. *See James* 2:17 ("So also faith by itself, if it does not have works, is dead."); *Romans* 12:1 (urging Christians, "in view of God's mercy," to devote their entire being to Him as "true and proper worship"); *see also Korte v. Sebelius*, 735 F.3d 654, 681 (7th Cir. 2013) (noting that religious belief is not confined to the home and the house of worship because "[r]eligious people do not practice their faith in that compartmentalized way."); Presbyterian Church in America, *Preface to the Book of Church Order*, Part II.4 ("[T]here is an

inseparable connection between faith and practice, truth and duty. Otherwise it would be of no consequence either to discover truth or to embrace it."), *available at* http://www.pcanet.org/beliefs/ (last visited January 22, 2014).

Christian doctrine requires a Christian to honor his or her conscience according to the faith. *1 Timothy* 1:19 ("[H]old[] faith and a good conscience. By rejecting this some have made shipwreck of their faith."); *1 Timothy* 3:9 ("[H]old the mystery of the faith with a clear conscience"). Scripture and history are replete with instances in which believers who were presented with a choice either to violate their consciences by complying with the state's demands or to face draconian penalties chose to maintain the integrity of their faith in every aspect of life and accept the consequences. *See generally* John Foxe, *Acts and Monuments* (1563) (recounting anecdotes of early Protestant martyrs). For example, the Old Testament Scripture recounts the stories of three Hebrew men who refused to worship an image of Babylonian King Nebuchadnezzar, despite the threat of execution for noncompliance. *See Daniel* 3:1-30. Shadrach, Meshach, and Abednego were cast "into the burning fiery furnace" for refusing to worship the king's image. *Id.* Whereas the Babylonian government conceived the requirement of bowing down to the image as merely an act of political loyalty, the three young men perceived it as a requirement to violate their faith through idolatry. *Id.*

Similarly, the second-century Christian martyr Polycarp was put to death for his refusal to state "Caesar is Lord." *See* Justo L Gonzalez, *The Story of Christianity*, Vol. 1, 43-44 (1984). To the Roman

government, the law was merely a political issue, but to Polycarp, it was an issue of idolatry. Likewise, the Protestant reformer Martin Luther, when asked to recant his beliefs, famously stated to Emperor Charles V, "[M]y conscience is captive to the Word of God. I cannot and I will not recant anything, since it is neither safe nor right to go against conscience. May God help me. Amen." Martin Luther, *Luther's Works, Vol. 33: Career of the Reformer III* (1972).

In sum, because Christian doctrine requires that faith govern every aspect of a Christian's life and teaches that a Christian's conscience is captive to the word of God, a Christian must act in accordance with his beliefs and in integrity of conscience in every aspect of life. Simply stated, the exercise of Christian faith must, as a matter of scriptural teaching, church tradition, and denominational requirement, guide and determine a Christian's decisions, choices, words, and deeds, both in private and in every facet of life.

II. Christian doctrine teaches that an individual's vocation is ordained by God as a spiritual enterprise in which Christians must serve in accordance with their spiritual callings.

Contrary to the government's position in this appeal, there is no dichotomy between commercial work and Christian religious exercise. To the contrary, Christianity teaches the exact opposite: that the holistic nature of the Christian faith encompasses a believer's vocation, imbuing it with spiritual significance. To assert that a Christian can compartmentalize his faith and religious practices separately from his vocation is a gross

misapprehension of the guiding religious principles at issue in this case. As explained below, the Christian doctrine of vocation teaches that any occupation to which a Christian is called has a sacred dimension and is a venue on which Christians must conduct themselves in accordance with their Christian beliefs and the dictates of their consciences.

A. The Christian doctrine of vocation teaches that all work is spiritual activity.

Christianity has long taught that work is divinely ordained and that even seemingly commercial endeavors have spiritual significance. The apostle Paul—the most prolific writer of the Christian New Testament—exhorted early Christians to engage in seemingly secular work *because of* its concomitant spiritual dimension. *See, e.g., Ephesians* 4:28 (stating Christians "must labor, doing honest work with his own hands, so that he may have something to share with anyone in need"); *Colossians* 3:23-24 (exhorting Christians in ostensibly secular employment to work diligently "as for the Lord"); *see also Korte*, 735 F.3d at 681 ("There is nothing inherently incompatible between religious exercise and profit-seeking.").

These scriptural commands are reflected in longstanding Christian practice and doctrines, most notably the doctrine of vocation. Ordinary human work is a key theological topic from the beginning of Scripture:

> A biblical understanding of work reaches back to the very beginning of the world. As we look at the doctrine of creation, we find human work

> placed into a context of God's work, of human creation in the image of God, of God's command for people to work as part of his provision for human life, and human cooperation with God in work.

Leland Ryken, *Work and Leisure in Christian Perspective* 128 (1987). Several theological truths shape the foundation of the Christian understanding of vocation. First, God is a worker. He is a creative craftsman, setting out the heavens and the earth and forming mankind from the dust. *Genesis* 1:1, 2:7 (noting that "God created the heavens and the earth" and that "God formed the man from the dust of the ground"). Similarly, Jesus Christ himself, during his time on earth, labored as a carpenter. *See Mark* 6:3. God's creative work has doctrinal implications for human work: "The Christian doctrine of creation at once renders impossible any dichotomy between the earthly and the sacred. The world has value to God and therefore to his creatures who live and work in it." Ryken, *Work and Leisure* at 122.

Second, Christian doctrine teaches that human beings are created in God's image. *See Genesis* 1:27 ("So God created man in his own image, in the image of God he created him."). Accordingly, humans work because God is a worker, and their work is modeled on His. In Christian theology, then, work is never a purely financial transaction, but something rooted in the very nature of the human person. *See* Dorothy Sayers, *Creed or Chaos? Why Christians Must Choose Either Dogma or Disaster (Or, Why It Really Does Matter What You Believe)* 89 (1949) ("[M]an, made in God's image, should make things, as God makes

them, for the sake of doing well a thing that is well worth doing."); Timothy Keller, *Every Good Endeavor: Connecting Your Work to God's Work* 38 (2013) ("What is the Christian understanding of work? . . . [It] is that work is not, primarily, a thing one does to live, but the thing one lives to do. It is . . . the medium in which he offers himself to God.").

Third, work is divinely ordained and prescribed by God. In what theologians call "the creation mandate," the Biblical account of creation recounts that in God's first spoken words to His newly created image bearers, He tasked them with tending and stewarding the earth. *See Genesis* 1:28 ("And God blessed them. And God said to them, 'Be fruitful and multiply and fill the earth and subdue it, and have dominion over the fish of the sea and over the birds of the heavens and over every living thing that moves on the earth.'"). The immediacy of this charge indicates the fundamental nature of work in mankind's *raison d'être*. The "link between work and God's creation of the world confirms that work has the character of a natural law. Like gravity, it is simply one of the 'givens' of the world God created." Ryken, *Work and Leisure* at 124.

B. The Christian theology of vocation encompasses both overtly sacred and seemingly secular occupations.

The foundational principles of the spirituality of work apply to the clergy and laity alike, and the Christian doctrine of vocation makes no distinction between "sacred" and "secular" occupations. A particular calling is no less religious because the worker is paid or because the work is ordinary or mundane:

> [N]o one should be ashamed of being called to a vocation through which God blesses people in more tangible ways: waiting on tables, digging foundations, hauling away garbage. Nor should those of us who are blessed by God through these vocations look down upon them. As for those who work with their hands—on a shop floor on a factory line, on a construction site—they are especially honored in the Bible, in a text that says much about vocation, ambition, and the Christian's life in the world: "Aspire to live quietly, and to mind your own affairs, and to work with your hands, as we instructed you, so that you may live properly before outsiders and be dependent on no one (*1 Thessalonians* 4:11-12).

Gene Edward Veith, Jr., *God at Work: Your Christian Vocation in All of Life* 74 (2002). Indeed, the word "vocation"—a term often used merely to mean an occupation—is weighty with spiritual meaning. *See Webster's Third New Int. Dictionary* 2561 (2002) (defining "vocation" as "a summons from God to an individual or group to undertake the obligations and perform the duties of a particular task or function in life"); The Compact Oxford English Dictionary 723 (2002) (defining "vocation" as "[t]he action on the part of God of calling a person to exercise some special function, especially of a spiritual nature, or to fill a certain position" and noting its Latin root *vocare*, meaning "to call" or

"summon"); *see also* William Perkins, *A Treatise of the Vocations* 750 (1631) ("A vocation or calling is a certain kind of life, ordained and imposed on man by God for the common good.").

The inseparability of sacred and secular work is particularly relevant to the 82 million Americans who identify themselves as Protestant or as members of a Protestant denomination. *See* U.S. Census Bureau, 2012 Statistical Abstract, *American Religious Identification Survey 2008: Self-Described Religious Identification of Adult Population*, *available at* http://www.census.gov/compendia/statab/cats/population/religion.html (last visited January 22, 2014); *see also* The Pew Forum on Religion & Public Life, *U.S. Religious Landscape Survey* 5 (2008) (noting that 26% of American adult population identifies as Evangelical Protestant, 18% identify as mainline Protestant, and seven percent identify as members of a historically black Protestant church), *available at* http://religions.pewforum.org/pdf/report-religious-landscape-study-full.pdf (last visited January 23, 2014).

Historically, the Protestant Reformation of the 16th and 17th centuries brought about a revitalized view of vocation, wherein *all* work done in faith by God's people was sacred, whether accomplished in the church and monastery or in the fields and courthouse. *See* Veith, *God at Work* 19; Ryken, *Work and Leisure* at 68-69 (noting the Reformers "began by rejecting the medieval division of work into sacred and secular" and that "[t]he result of this was to make all work done for God's glory sacred"); Douglas J. Schuurman, *Vocation: Discerning Our Callings in Life* 5 (2004) ("As Luther saw it, the labors of the cobbler and the preacher are equally holy and

equally valued by God if undertaken in faith. [B]oth reformers insisted that all legitimate social roles were holy if undertaken in faith.").

Subsequent generations of Protestant theologians likewise emphasized the spiritual significance of "secular" work. For example, the influential American Puritan minister Cotton Mather wrote: "When you Handle the Plough, or Handle the Axe, or use either Nerves or Brains in your Occupation, and whatsoever ye do, you may do all for the Lord Jesus Christ." Mather, *Two brief Discourses* 69. Similarly, according to the Puritan clergyman William Law,

> [W]orldly business is to be made holy unto the Lord, by being done as a service to Him, and in conformity to His Divine will.
>
> * * *
>
> Men of worldly business, therefore, must not look upon themselves as at liberty to live to themselves, to sacrifice to their own humors and tempers, because their employment is of a worldly nature. But they must consider, that, as the world and all worldly professions as truly belong to God, as persons and things that are devoted to the altar, so it is as much the duty of men in worldly business to live wholly unto God, as it is the duty of those who are devoted to Divine service.
>
> * * *

> Men may, and must differ in their employments, but yet they must all act for the same ends, as dutiful servants of God, in the right and pious performance of their several callings. Clergymen must live wholly unto God in one particular way . . . . But men of other employments are, in their particular ways, as much obliged to act as the servants of God, and live wholly unto Him in their several callings.

William Law, *A Serious Call to a Devout and Holy Life* 20 (1728); *see also Hosanna-Tabor*, 132 S. Ct. at 709 (rejecting the supposed dichotomy between religious and secular duties and noting that "[t]he heads of congregations themselves often have a mix of duties, including secular ones"). In sum, as a matter of longstanding and widely recognized Protestant Christian doctrine, all work—whether overtly sacred or seemingly secular—is spiritual activity ordained by God, and every believer's vocation is a spiritual calling.

C. The Christian doctrine of vocation teaches that Christians are called by God to specific occupations and activities.

In addition to the Christian belief that ostensibly secular work is divinely ordained and weighted with spiritual significance, the doctrine of vocation teaches that Christians are called by God not merely to work generally but to specific occupations and activities. *See, e.g., 1 Corinthians* 7:17 ("Only let each person lead the life that the Lord has assigned to

him, and to which God has called him. This is my rule in all the churches."); *Esther* 4:14 (noting that Esther's unexpected elevation to Persian nobility was a providential appointment to a station in which she should serve God and others through her unswerving devotion to God and his calling). Indeed, "vocation" is defined in part as "[t]he *particular* function or station to which a person is called by God." The compact Oxford English Dictionary (emphasis added); *see also Webster's Third New Int. Dictionary* 2561 (2002) (defining "vocation" as "a summons from God to an individual or group to undertake the obligations and perform the duties of a *particular task or function* in life") (emphasis added).

This specificity of calling was a theme of the Protestant reformers. Martin Luther taught that every Christian had at least two vocations or callings: "the call to become part of the people of God" and "the call to a particular line of work." William C. Placher, ed., *Callings: Twenty Centuries of Wisdom on Vocation* 206 (2005). Similarly, John Calvin wrote that "each individual has his own kind of living assigned to him by the Lord as a sort of sentry post so that he may not heedlessly wander about throughout life." John Calvin, *Institutes of the Christian Religion* 3.X.6 (1559) (John T. McNeill ed., Ford Lewis Battles trans., 1960).

Like the Reformers, subsequent generations and Protestant denominations continued to recognize the specificity of one's divine occupational calling. For example, the Puritan theologian William Perkins taught that the call of God is often a call to a particular type of ordinary work:

> A personal calling is the execution of some particular office, arising of that distinction which God makes between man and man in every society. First I say, it is *the execution of some particular office*, as, for example, the calling of a Magistrate is to execute the office of government over his subjects, the office of a Minister is to execute the duty of teaching his people, the calling of a Master is to execute the office of authority and government over his servants, the office of a Physician is to put in practice the good means whereby life and health are preserved. In a word, in every estate the practice and execution of that particular office, wherein any man is placed, is his personal calling.

Perkins, *A Treatise of the Vocations* at 754 (emphasis in original); *see also* Mather, *Two brief Discourses* 37-38 ("[E]very Christian hath also a Personal Calling; or a certain Particular Employment, by which his Usefulness in his Neighbourhood is distinguished . . . . It is not only necessary, That a Christian should follow his General Calling, it is of necessity, that he follow his Personal Calling too.").

Contemporary theologians continue to recognize the specificity of one's vocational field: "We can therefore properly say as a matter of secondary calling that we are called to homemaking or to the practice of law or to art history." Os Guinness, *The Call: Finding and Fulfilling the Central purpose of*

Your Life 31 (1998). The twentieth-century Quaker theologian Elton Trueblood, who served as chaplain to both Harvard and Stanford universities, noted that this specificity of calling means that "[m]ost men ought to stay where they are and make their Christian witness in ordinary work rather than beyond it." Elton Trueblood, *Your Other Vocation* 58 (1952).

This specificity of calling magnifies the dilemma faced by a Christian business owner, who is forced to choose between violating his conscience or leaving his business. Because God calls men and women to particular vocations and businesses, *both* of these choices are aptly characterized as violations of conscience. In the absence of accommodation of his religious belief, his choice is not *whether* to violate God's calling and commands, but *how* he will violate them.

D. The Christian doctrine of vocation requires that Christians act in their vocations in accordance with their Christian beliefs.

Christian doctrine teaches that a central task of the Christian is to fulfill his vocational work as spiritual service to God and for the aid of his fellow man. Whether he is an unskilled laborer, a highly educated professional, an executive, or a business owner, a Christian is called to work, and he violates the fundamental tenets of the faith if he checks his faith at the workplace door. The doctrine of vocation is a key element of the Christian's duty to life in the world, because it gives specific content to the manner in which Christian believers love their neighbors, as commanded by Jesus. *See, e.g., Mark* 12:31 ("You

shall love your neighbor as yourself."). In other words, in Christian doctrine, the calling to ordinary work is a primary means by which the people of God love their neighbors.

There are important implications to this theological requirement. The doctrine of vocation teaches that God does His work in the world *through* Christians loving and serving others *through* their vocations. Gustaf Wingren, *Luther on Vocation* 8-9 (Carl Rasmussen, tr.) (1957) (" '[God] gives the wool, but not without our labor. If it is on the sheep, it makes no garment.' . . . [I]t must be sheared, carded, spun, etc. In these vocations God's creative work moves on, coming to its destination only with the neighbor who needs the clothing.") (quoting 17 *D. Martin Luthers Werke: Kritische Gesamtausgabe* 414-18 (1883)).

Christianity, however, teaches that Christians are incapable of performing these requisite "good works" on their own. The Westminster Confession of Faith, researched and drafted in the 1640s, and which is among the foundational doctrinal statements of many mainline American Protestant denominations today, provides that "[g]ood works are only such as God hath commanded in his holy Word, and not such as, without the warrant thereof, are devised by men, out of blind zeal, or upon any pretense of good intention." *Westminster Confession of Faith* § 16.1 (1646). They "are the fruits and evidences of a true and lively faith," *id.* § 16.2, and Christians' "ability to do good works is not at all of themselves, but wholly from the Spirit of Christ," *id.* § 16.3.

Christians—including the owners of Hobby Lobby, Mardel, and Conestoga Wood Specialties—

perceive a religious duty to work for the good of their employees, the communities in which they are located, and their families. *See The Baptist Faith & Message 2000*, Article XV ("All Christians are under obligation to seek to make the will of Christ supreme in our own lives and in human society.), *available at* http://www.sbc.net/bfm/bfm2000.asp (last visited January 22, 2014).

Christian doctrine has long taught that Christians of every occupation must practice their business in accordance with their general calling to be Christian:

> Every particular calling must be practiced in and with the general calling of a Christian. It is not sufficient for a man in the congregation and in common conversation to be a Christian, but in his very personal calling he must show himself to be so. As for example . . . [a] Schoolmaster must not only be a Christian in the assembly, when he hears the Word and receives he Sacraments, but he must also show himself to be a Christian in the office of his teaching. And thus must every man behave himself in his particular calling.

Perkins, *A Treatise of the Vocations* at 756-57. Furthermore, because a Christian's occupational endeavors are a fulfillment of God's call, those acts must be in conformity with His commands, and a

Christian must abstain from any action in his work contrary to his faith:

> If the duties and obligations of these spheres serve the neighbor, they should be fulfilled "as to the Lord" . . . . If the duties and obligation of these spheres harm the neighbor, they should be rejected for the sake of the Lord, who died for all. Those spheres should be transformed, if at all possible, so that they issue in actions that serve the neighbor. One is not called to be a Christian "in general"; one is called to be a Christian in the concrete social locations one presently occupies.

Schuurman, *Vocation* at 29; *see also* Mennonite Church USA Confession of Faith, Art. 23, *The Church's Relation to Government and Society* ("We may participate in . . . society only in ways that do not violate the love and holiness taught by Christ and do not compromise our loyalty to Christ."), *available at* http://www.mennoniteusa.org/about/confession-of-faith-in-a-mennonite-perspective-1995/article-23-government/ (last visited January 19, 2014).

In sum, according to Christian thinking, Christians—including the owners of for-profit businesses—are called by God to work in particular occupations and businesses and to do so as an expression of their faith and in accordance with the dictates of their faith and conscience.

III. Christian doctrine states it is a sin for a Christian to enable or aid another in doing what the Christian believes to be sin.

Christian doctrine, like the civil and criminal law of this nation, teaches that one who knowingly aids or abets another's wrongdoing has himself done wrong. *See, e.g., 1 Corinthians* 8:9-13 (warning Christians to take care not to be a "stumbling block" to others and noting that "sinning against your brothers and wounding their conscious when it is weak, you sin against Christ"); *Romans* 14:13-14 ("Therefore let us not pass judgment on one another any longer, but rather decide never to put a stumbling block or hindrance in the way of a brother" and thus cause them to sin); *Matthew* 18:6 ("[W]hoever causes one of these little ones who believe in me to sin, it would be better for him to have a great millstone fastened around his neck and to be drowned in the depth of the sea."); *The Larger Catechism of the Westminster Assembly* 245 (1841) ("That what is forbidden or commanded to ourselves, we are bound, according to our places, to endeavour that it may be avoided or performed by others."); *see also Gilardi v. U.S. Dept. of Health and Human Servcs.*, 733 F.3d 1208, 1215 (D.C. Cir. 2013) (noting that "even attenuated participation may be construed as a sin") (citation omitted).

This principle applies with particular force to situations in which a Christian's action or inaction involves the taking of life. *See, e.g., The Large Catechism by Martin Luther* (1529), reprinted in *Triglot Concordia: The Symbolical Books of the Ev. Lutheran Church* (1921) ("So also, if you see any one innocently sentenced to death or in like distress, and do not save him, although you know ways and means

to do so, you have killed him."); Thomas Vincent, *An Explanation of the Assembly's Shorter Catechism* 171-72 (1806) ("We are forbidden to kill . . . others, either directly . . . or indirectly, by doing any thing that tendeth thereunto. . . . We may be guilty of the murder of . . . others, indirectly, by doing any thing that tendeth to take away . . . others lives.").

Courts and legislatures have long recognized that one's sincere religious beliefs may prevent him from approving, authorizing, or aiding another in something the believer considers to be wrong, even if the believer is not himself committing the underlying wrong. For example, Congress exempts religious conscientious objectors not only from combat roles but from participation "in any form" in war. 50 U.S.C. App. § 456(j); *Hanna v. Secretary of the Army*, 513 F.3d 4 (1st Cir. 2008) (upholding permanent injunction exempting Coptic Christian physician from active duty because she could not perform her chosen profession in the military context without violating her deeply held religious beliefs). Also, physicians and hospitals with a religious objection to abortion are exempt not only from performing abortion but also from assisting, making facilities available, or even making referrals for abortion. 42 U.S.C. § 300a-7; 42 U.S.C. § 238n. Similarly, "eleven states and the federal government have adopted some type of statute or regulation to ensure that individuals are not forced to participate in executions against their will." Mark L. Rienzi, *The Constitutional Right Not to Kill*, 62 Emory L.J. 121, 139 (2012).

The courts, like the legislatures, have recognized that one's religious belief may prevent him from any attenuated authorization or complicity in conduct he

considers to be wrong. *See, e.g., Thomas v. Anchorage Human Rights Comm'n*, 165 F.3d 692 (9th Cir. 1999) (recognizing a Christian landlord's sincere religious belief that unmarried cohabitation was sin merited exemption from state and local housing laws), vacated *en banc* as not ripe for judicial review, 220 F.3d 1134 (9th Cir. 2000); *Attorney Gen. v. Desilets*, 636 N.E.2d 233 (Mass. 1994) (same); *State by Cooper v. French*, 460 N.W.2d 2, 7 (Minn. 1990) (same).

The statutory and judicial religious exemptions enumerated above are notable for several reasons. First, none of them make the applicability of the exemption dependent on the religious believer's tax status, *i.e.*, whether the religiously motivated conduct involves commercial or non-profit activities. *See, e.g., Desilets*, 636 N.E.2d at 238 ("The fact that the defendants' free exercise of religion claim arises in a commercial context . . . does not mean that their constitutional rights are not substantially burdened."). Second, they recognize that religious belief not only prevents the believer from engaging directly in sin but also prevent any participation, authorization, or enabling of what he considers to be sin. *See* Rienzi, 62 Emory L.J. at 139 (noting that statutory exemptions from participating in capital punishment "protect the individual not only from direct involvement—such as personally administering a lethal injection or turning on the electric chair—but also less direct involvement such as preparing the individual and apparatus used, supervising other people who will do these things, or even attending the execution.") (citation omitted). Finally, many of these exemptions involve situations involving the taking of human life, recognizing that to compel an individual to participate in what he

believes to be an unjustified taking of life imposes a grievous burden on his exercise of his beliefs.

IV. Requiring a Christian to choose between violating the Government's regulations or violating his sincerely held religious beliefs substantially burdens his exercise of religion.

The Religious Freedom Restoration Act of 1993 ("RFRA"), 42 U.S.C. §§ 2000bb *et seq.*, prohibits the federal government from substantially burdening "a person's exercise of religion," *id.* at § 2000bb-1(a), unless applying that burden is the "least restrictive means of furthering . . . [a] compelling governmental interest," *id.* at § 2000bb-1(b). In enacting RFRA, Congress sought to restore the compelling interest test for defenses to claims that a facially neutral law of general applicability "substantially burdens" the free exercise of religion—a test that had been abandoned by the Supreme Court in *Employment Division, Department of Human Resources v. Smith*, 494 U.S. 872 (1990). *See* 42 U.S.C. § 2000bb(b)(1) ("The purposes of this chapter are: (1) to restore the compelling interest test as set forth in *Sherbert v. Verner*, 374 U.S. 398 (1963) and *Wisconsin v. Yoder*, 406 U.S. 205 (1972) and to guarantee its application in all cases where free exercise of religion is *substantially burdened*.") (emphasis added). Thus, RFRA creates a statutory right to exemption from laws that substantially burden sincere religious beliefs, even if the law is neutral and generally applicable, unless the government can prove that "strict scrutiny" is met. *O'Bryan v. Bureau of Prisons*, 349 F.3d 399, 401 (7th Cir. 2003).

The existence of a substantial burden is most apparent when the government forces a person or group to "perform acts undeniably at odds with fundamental tenets of their religious beliefs." *Wisconsin v. Yoder*, 406 U.S. 205, 218 (1972) (finding that compulsory formal secondary education was an undue burden on the free exercise of Amish parents' religion). Further, a substantial burden can arise indirectly if the receipt of benefits is conditioned on the performance of conduct proscribed by a religious faith, or benefits are denied because of conduct required by a religious faith. *Thomas v. Review Bd. of Indiana Employment Sec. Div.*, 450 U.S. 707, 717-18 (1981) (determining that a denial of unemployment benefits to an employee who had a religious objection to war was a burden on his religion).

As a threshold matter, the religious objection or conduct at issue must be both sincere and religious. *See United States v. Seeger*, 380 U.S. 163, 184–86 (1965) (holding an objection to military conscription must be protected only if it arises from sincerely held religious beliefs rather than personal morals). The religious belief is not, however, required to be central to the person's faith, 42 U.S.C. § 2000cc-5(7)(A), nor is it required to be a correct interpretation. *See United States v. Lee*, 455 U.S. 252, 257 (1982) ("Courts are not arbiters of scriptural interpretation."); *but see Hernandez v. C.I.R.*, 490 U.S. 680, 699 (1989) (finding that "hav[ing] less money available" for religious purposes due to an exemption from tax breaks is not a substantial burden on religion). Instead, a party must only show an "honest conviction" that the pressure from the government substantially conflicts with his religion.

Thomas, 450 U.S. at 716. Rather than questioning the validity of the belief, the court undertaking the substantial burden analysis under RFRA should focus on the intensity of the coercion applied by the government, requiring that the restrictive law protect "interests of the highest order." *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 546 (1993).

Christian doctrine requires a Christian worker or business owner to conduct his business in line with his beliefs. *See* Part II.D, *supra*. Furthermore, under the doctrine of vocation, a Christian should not be required to find a new job or change his business—to which he has been specifically called by God—solely because of governmental intrusion. *See* Part II.C, *supra; see also The Baptist Faith & Message 2000*, Article XVII ("Civil government being ordained by God, it is the duty of Christians to render loyal obedience thereto in all things not contrary to the revealed will of God. . . . The state has no right to impose penalties for religious opinions of any kind."), *available at* http://www.sbc.net/bfm/bfm2000.asp (last visited January 23, 2014). To force a Christian business owner to choose between paying crippling fines by conducting his business in line with his religious tenets or sacrificing his core values in order to preserve his business is exactly the type of coercion the substantial burden test encompasses.

This Court has previously recognized that sincerely-held religious beliefs subject to government pressure at the workplace can result in a substantial burden on religion. *See Thomas*, 450 U.S. at 716 (finding a substantial burden existed when an employee, who had a religious belief against producing war materials, was denied unemployment

benefits after quitting because of a transfer to a tank turret production factory); *Sherbert v. Verner*, 374 U.S. 398, 404 (1963) (holding that denial of unemployment benefits placed a substantial burden on a Seventh-day Adventist who quit her job after being forced to work on a Saturday).

Significantly, in the Affordable Care Act ("ACA"), Congress has recognized this substantial burden by establishing exemptions for other religious groups cornered into making this choice. *See* 45 C.F.R. § 147.131 (2013) (allowing HRSA to exempt religious employers from requirement to cover contraceptive services under group health plan); *see generally* 78 Fed. Reg. 39870 (July 2, 2013) ("[G]roup health plans established or maintained by certain religious employers (and group health insurance coverage provided in connection with such plans) are exempt from the otherwise applicable requirement to cover certain contraceptive services"). The inherent discrimination involved in the Government's recognition of exempt groups only compounds the burdensome nature of the fines imposed by the Government's regulations on non-exempt groups that share exactly the same religious views. *See Sherbert*, 374 U.S. at 406 (recognizing that a prohibition against requiring employees to work on Sunday compounds the unconstitutionality of forcing a Sabbatarian to work on Saturday).

In sum, the government's regulations substantially burden a Christian business owner's exercise of his religion by imposing draconian fines on him as a result of his acts that are specifically mandated by Christian doctrine.

CONCLUSION

For the reasons set forth above, *amici* respectfully request this Court hold that RFRA allows a for-profit corporation to abstain from providing its employees with certain abortifacient contraceptives based on the religious objections of the corporation's owners.

Respectfully submitted,

Jay T. Thompson
Counsel of Record
Miles Coleman
Brandon Smith
NELSON MULLINS RILEY & SCARBOROUGH, LLP
1320 Main Street
Columbia, SC 29201
jay.thompson@nelsonmullins.com
(803) 799-2000

Counsel for *Amici Curiae*

January 28, 2014

APPENDIX

List of *Amici Curiae*

List of *Amici Curiae*[1]

Southeastern Baptist Theological Seminary

Coalition of African American Pastors

Manhattan Declaration

InStep International

Daniel Akin, Ph.D.
President, Southeastern Baptist Theological Seminary

Bruce Ashford, Ph.D.
Provost and Dean of Faculty, Associate Professor of Theology and Culture, Southeastern Baptist Theological Seminary

E. Calvin Beisner, Ph.D.
Founder and National Spokesman, The Cornwall Alliance for the Stewardship of Creation

John A. Bloom, Ph.D.
Professor of Physics and Academic Director for M.A. Program for Science and Religion, Biola University

Linwood Bragan, J.D.
Executive Director, CapStand Council for Policy and Ethics

---

[1] Identification of organizations, institutions, and businesses with which individual *amici curiae* are affiliated does not imply endorsement by the respective organizations, institutions, and businesses.

Chad O. Brand, Ph.D.
Professor of Christian Theology, Southern Baptist Theological Seminary

Donald Arthur "D.A." Carson, Ph.D.
Research Professor of New Testament, Trinity Evangelical Divinity School

David O. Dykes, D.Min.
Senior Pastor, Green Acres Baptist Church
Tyler, Texas

Matthew Flannagan, Ph.D.
Teaching Pastor, Takanini Community Church,
Auckland, New Zealand

Norman L. Geisler, Ph.D.
Professor of Apologetics and Co-Founder of Southern Evangelical Seminary and Veritas Evangelical Seminary

Rev. Trevón Gross
Senior Pastor, Hope Cathedral
Jackson, New Jersey

Wayne A. Grudem, Ph.D.
Research Professor of Theology and Biblical Studies, Phoenix Seminary

Danny Han, D.Min.
Senior Pastor, JOY Christian Fellowship
Englewood, New Jersey

Daniel R. Heimbach, Ph.D.
Senior Professor of Christian Ethics, Southeastern Baptist Theological Seminary

Joseph M. Holden, Ph.D.
President and Professor of Theology and Apologetics, Veritas Evangelical Seminary

Hershel Wayne House, Th.D., J.D.
Distinguished Research Professor of Theology Law and Culture, Faith Evangelical College and Seminary

Bishop Harry R. Jackson, Jr.
Senior Pastor, Hope Christian Church and Presiding Bishop of International Communion of Evangelical Churches

Clay Jones, D.Min.
Associate Professor of Christian Apologetics, Biola University

David W. Jones, Ph.D.
Associate Professor of Christian Ethics and Director of Th.M. Studies, Southeastern Baptist Theological Seminary

Kenneth D. Keathley, Ph.D.
Professor of Theology and Director of the L. Russ Bush Center for Faith & Culture, Southeastern Baptist Theological Seminary

Kevin A. Lewis, M.Div., J.D.
Associate Professor of Theology and Law, Biola University

Rev. Art Lindsley, Ph.D.
Vice President of Theological Initiatives, Institute for Faith, Work and Economics

Scott Matscherz, D.Min.
Academic Dean and Professor of Ministry and Religion, Veritas Evangelical Seminary

Alex McFarland, D.Div.
Director for Christian Worldview and Apologetics, Christian Worldview Center of North Greenville University

Eric Metaxas
American Author and 2012 Keynote Speaker for National Prayer Breakfast

Terry Mortenson, Ph.D.
Speaker, Writer, and Researcher, Answers in Genesis

Andrew D. Naselli, Ph.D.
Assistant Professor of New Testament and Biblical Theology, Bethlehem College and Seminary

J. Randall Price, Ph.D.
Executive Director, Center for Judaic Studies and Distinguished Research Professor, Liberty University

Scott B. Rae, Ph.D.
Professor of Philosophy of Religion and Ethics and Dean of Faculty, Talbot School of Theology, Biola University

Rick Schenker
President and CEO, Ratio Christi

Rev. Gregory S. Smith
President, InStep International

John Stonestreet
Speaker and Fellow, Chuck Colson Center for Christian Worldview

Derek W.H. Thomas, Ph.D.
Professor of Systematic and Historical Theology. Reformed Theological Seminary
Senior Pastor, First Presbyterian Church Columbia, South Carolina

Frank Turek, D.Min.
Author and Theologian

Eric Teetsel
Executive Director, Manhattan Declaration

Richard D. Warren, D.Min.
Founder and Senior Pastor, Saddleback Church
Lake Forest, California

Hugh C. Whelchel, Th.M.
Executive Director, Institute for Faith, Work and Economics

Ravi Zacharias, D.Div.
Founder, Ravi Zacharias International Ministries